

IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

EDWARD F. WEINBERG	)	
ILYNE R. WEINBERG	)	
	)	
PLAINTIFFS	)	
	)	Case No. 08 C 663
V.	)	
	)	JUDGE HOLDERMAN
FIRST FRANKLIN FINANCIAL CORP.	)	
FLAGSHIP MORTGAGE CORP.	)	MAGISTRATE JUDGE KEYS
	)	
DEFENDANTS	)	

**MOTION FOR  
EXTENSION OF TIME TO FILE ANSWER OR OTHERWISE PLEAD**

NOW COMES the defendant, First Franklin Financial Corp. ("FFFC"), by and through its attorneys, Thomas J. Dillon, Timothy J. Somen and McFadden & Dillon, P.C. and for its first Motion, pursuant to Fed. R. Civ. P. 6, for Extension of Time to File an Answer or Otherwise Plead in the above-captioned cause states as follows:

1. The above-captioned cause was filed on January 30, 2008.
2. Service of process was made upon FFFC on February 1, 2008 by way of FFFC's Registered Agent in Chicago, Illinois.
3. Pursuant to Fed. R. Civ. P. 12 FFFC's Answer or other responsive pleading to the Complaint is due to be filed with this Court on February 20, 2008.
4. The undersigned counsel's office appeared on behalf of FFFC in the above-captioned cause on February 8, 2008.

5. The undersigned counsel has requested from FFFC and is in the process of reviewing the FFFC file documents retained in connection with this matter in order to investigate possible available defenses and counter or cross claims which FFFC may be able to assert in the above-captioned cause.

6. Accordingly, pursuant to Fed. R. Civ. P. 6, FFFC hereby requests an enlargement of time through and including March 19, 2008 within which to file its answer or other responsive pleading to the plaintiff's Complaint in the above-captioned cause.

7. This Motion represents FFFC first request for a brief extension of time and is not intended to needlessly delay these proceedings. Further, at this stage of the litigation there will be no prejudice to the plaintiffs.

**WHEREFORE**, the defendant, First Franklin Financial Corp., respectfully requests that this Honorable Court enter an Order (i) granting First Franklin Financial Corp. an extension of time through and including March 19, 2008 to file its Answer or other responsive pleading in the above-captioned cause and (ii) granting such further and additional relief as the Court may deem just and proper.

Dated: February 20, 2008

Respectfully submitted,

s/ Timothy J. Somen, Esq.  
One of the attorneys for  
defendant, First Franklin  
Financial Corp.

Thomas J. Dillon (Ill.ARDC No. 3124223)  
Timothy J. Somen (Ill.ARDC No. 6279438)  
McFadden & Dillon, P.C.  
120 South LaSalle Street  
Suite 1335  
Chicago, Illinois 60603  
(312) 201-8300